

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

JUDICIAL WATCH, INC., et al.,)	
)	
Plaintiffs,)	
)	
v.)	1:12-cv-800-WTL-TAB
)	
J. BRADLEY KING, et al.,)	
)	
Defendants.)	

**DEFENDANTS' UNOPPOSED MOTION FOR SECOND EXTENSION OF TIME TO
RESPOND TO DISCOVERY REQUESTS**

Defendants J. Bradley King and Trent Deckard, Co-Directors of the Indiana Election Division, and Connie Lawson, Indiana Secretary of State, by counsel, pursuant to Southern District of Indiana Local Rule 6.1(d), hereby move the Court for a thirty day extension of time within which the Defendants are to respond to the discovery requests, and in support state as follows:

1. On December 7, 2012, Plaintiffs requested that Defendants produce various documents and answer interrogatories within thirty days.
2. On January 4, 2013, Defendants provided notice of an initial 28-day extension of time to respond to Plaintiffs' discovery requests.
3. Accordingly, the deadline for Defendants to respond to Plaintiffs' request is February 4, 2013, the first non-weekend following the 28-day period. That deadline has not passed.

4. Undersigned counsel contacted Defendants' counsel, Chris Fedeli, on February 4, 2013. Mr. Fedeli stated that he had no objection to the thirty-day extension of time to respond to discovery.

5. The discovery requests served on Defendants include extensive requests for numerous documents, and Defendants may require an additional extension of time to respond to Plaintiffs' discovery requests.

Pursuant to Southern District of Indiana Local Rule 6.1(d), Defendant request that their responses to Plaintiffs' discovery requests be due on or before March 6, 2013.

Respectfully submitted,

GREGORY F. ZOELLER
Indiana Attorney General
Attorney No. 1958-98

By: /s/ Jefferson S. Garn
Jefferson S. Garn
Deputy Attorney General
Attorney No. 29921-49

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of February, 2013, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to the counsel of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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